Note: DRAFT sent to MDNR, via E-mail, on December 14, 1998
Proposed permit withdrawn by state on December 24, 1998

Roger Randolph, Staff Director
Air Pollution Control Program
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102

Dear Mr. Randolph:

On November 16, 1998, we received the proposed Title V permit for Associated Electric Cooperative (AECI), Thomas Hill Energy Center (Project Number 175-0001-0001). Based on our review of the proposed permit and supporting information, EPA formally objects, under the authority of Section 505(b) of the Clean Air Act (the Act) and 40 C.F.R. §70.8(c) (see also 10 CSR 10-6.065(6)(E)1.E.(III)), to the issuance of the permit on the basis that it does not fully meet the periodic monitoring requirements of §70.6(a)(3)(i). EPA also objects to the proposed permit because it omits certain applicable requirements. The issues that form the basis for our objection are explained in further detail in Attachment A. Attachment B recommends other minor revisions to correct awkward language and typographical errors. Attachment C summarizes EPA's policy on periodic monitoring and helps to clarify the concerns we have with the permit.

As you know, 40 C.F.R. §70.8(c) requires EPA to object to the issuance of a proposed permit in writing within 45 days of receipt of the proposed permit (and all necessary supporting information) if EPA determines that the permit is not in compliance with the applicable requirements under the Act or 40 C.F.R. Part 70. Section 70.8(c)(4) and Section 505(c) of the Act further provide that if the State fails to revise and resubmit a proposed permit within 90 days to satisfy the objection, the authority to issue or deny the permit passes to EPA and EPA will act accordingly. Because the objection issues must be fully addressed within the 90 days, we suggest that the revised permits be submitted in advance in order that any outstanding issues may be addressed prior to the expiration of the 90-day period.

If appropriate, we would be available to meet with your staff to clarify and discuss resolution of our concerns. Meanwhile, if you have any questions, please contact Jon Knodel at (913) 551-7622.

Sincerely,

William Spratlin, Director
Air , RCRA, and Toxics Division

cc: John Walke, Office of General Counsel
Kirt Cox, Office of Air Quality Planning and Standards
Sara Terry, Office of Air Quality Planning and Standards
Robert Dresdner, Office of Enforcement and Compliance Assurance
Daniel Hedrick, Associated Electric Cooperative Association

bcc: Ward Burns, Air Permits and Compliance Branch

Attachment A
EPA Objection Issues

Periodic Monitoring for Particulate Matter for Units MB1, MB2, and MB3

When using parametric data to satisfy the periodic monitoring requirements, the affected unit must establish a relationship between the control equipment parameters and an emission test that provides a high likelihood that the emissions unit is in compliance with the underlying standard. Typically, a source performs a stack test using the appropriate Reference Method test procedures to establish that the unit is in compliance with the applicable requirement. Simultaneously, the source collects a series of key parameters to establish a baseline control equipment performance level. From these data, the source can develop a strategy to periodically evaluate the parameters to assure that the control equipment continues to perform at a level sufficient to provide a reasonable assurance of compliance.

The relationship described above does not exist in the AECI permit, even though the permit makes reference to past performed stack tests and specifies what ESP parameters to measure. Therefore, the permit lacks periodic monitoring sufficient to provide a reasonable assurance of compliance over the relevant time period.

The permit makes reference to the date of last performance test for each unit, ranging from 1981 for Unit MB2 to1996 for Units MB1 and MB3. For Units MB1 and MB3, it is possible that the 1996 test report may contain sufficient documentation to establish a link a link between ESP performance and compliance with the particulate matter standard. However, we question whether the18-year-old test data for Unit MB2 is appropriate; whether baseline parameters exist or not. Lots of factors change over time, including fuel characteristics, ash handling performance, and control equipment effectiveness; all of which could have an adverse impact on ESP performance.

The permit also requires AECI to monitor four sets of parameters – primary and secondary voltage, primary and secondary amperage, sparking rate, and the number of on-line fields -- for each ESP at least once a week. While these parameters are good measures of ESP performance, the permit does not clearly specify how they link to the latest reference method results and how they are to be used to provide a reasonable assurance of compliance over time. This link must be made if the ESP data are to serve as periodic monitoring.

Lastly, we do not believe that the once-a-week ESP parameter monitoring is of a sufficient frequency to provide a reasonable assurance of compliance with the standard over its short-term averaging period (generally considered to be 3 hours, corresponding to the time it takes to collect the necessary data during a Reference Method test). With up to 168 hours of operation each week, we do not believe that measurement of parameters during just one or those hours is representative over all source operations. While it is not our intent to require early application of CAM it is clear that once CAM begins AECI will have to monitor ESP parameters

much more frequently – as often as every 15-minutes. Then or now, we believe that the principle that periodic monitoring be representative of the source's compliance over the relevant time period requires more frequent sampling than once-a-week.

We have enclosed two examples of periodic monitoring for sources controlling particulate emissions with an ESP. The first, an excerpt from an Iowa Title V permit, takes a rigorous control equipment inspection and maintenance approach, along with use of the continuous opacity monitor and audible precipitator malfunction alarm, to assure continuing high performance of the ESP. The second, from EPA's CAM Technical Guidance Document, takes the more traditional parameter measurement approach. Either example provides a good starting point for the AECI permit. Other options may include: 1) correlating COMS data to the PM standard, 2) correlating injection rate of specific compounds to the ash content of the fuel and the emission rate, or 3) another monitoring approach demonstrated by AECI to be a valid method for assuring compliance with the applicable short-term particulate matter standard.

If the department elects to pursue the parametric monitoring approach and AECI is unable to establish the parametric relationships prior to final permit issuance, the permit may provide a reasonable schedule for collection and analysis of the necessary data and development of the periodic monitoring plan. However, we believe that any such schedule should not extend past the first compliance year of the permit.

Periodic Monitoring for Sulfur Dioxide for Units MB1, MB2, and MB3

The proposed permit requires Units MB1 and MB2 to verify compliance, once-a-year, based solely on the results of the reference method tests conducted during the acid rain program Part 75 Relative Accuracy Test Audits (RATA) [see pages 20-21, and 25-26]. Further, the permit requires the source only to retain and report the results of the annual performance tests. The permit is silent on the storage, use, and reporting of the real time, quality assured CEMS data that will be readily available. Overall, this strategy does not provide a reasonable assurance of compliance over the short-term 3-hour averaging period the SO_2 SIP standard. It also appears to impose restrictions on the use of other data to establish credible evidence of a violation.

Units MB1, MB2, and MB3 all continuously monitor SO_2 emissions as part of the acid rain program. While the focus of the acid rain program is to collect mass emissions, the monitors also provide the fundamental building blocks to allow for real-time measurement of SO_2 in the units of the SIP standard; #SO_2/mmBtu. With both SO_2 and diluent (e.g. carbon dioxide or oxygen) concentration data, well established calculation methodologies (e.g. 40 CFR Part 60, Appendix A, Method 19), and sophisticated data acquisition and handling systems (DAHS), it takes little additional effort to calculate emissions in units of #SO_2/mmBtu. Also, because of the rigorous quality assurance requirements under the acid rain program, the data collected from these monitors is of the highest quality.

EPA's "Guidance on Periodic Monitoring" makes clear that a once a year stack test is not sufficient to provide a reasonable assurance of compliance for a short term standard. Further, the

guidance strongly recommends that where existing continuous emission monitors provide quality assured data, those monitors should be used as the periodic monitoring method. The permit record provides no rationale for why the SO_2 CEMS might have been discounted as the periodic monitoring method. We believe that no such rationale exists and that the CEMS must be used to satisfy the periodic monitoring requirements.

While the permit, on page 30, specifies that AECI shall use the CEMS to "determine the hourly SO_2 emission rate" for Unit MB3 – which is subject to NSPS Subpart D – it is not clear that the department expects this data to be used in any meaningful way. To the contrary, it appears that Condition (c)(1)(c)(I) may preempt use of the CEMS data in favor of the annual performance test. So that the permit does not undermine the use of any credible evidence, we believe that the permit should not limit the use of any data which may be relevant to the SO_2 compliance calculation.

AECI evaluates the SO_2 CEMS data at least once each quarter for each unit to prepare the reports required by the acid rain program. With minimal effort, AECI should be able to provide periodic reports summarizing the performance of Units MB1, MB2, and MB3 against all applicable SO2 requirements. It is likely that AECI is already providing these reports to the department on a quarterly or semi-annual cycle. In any case, the permit should clearly explain the reporting requirements, including format and frequency, for the SO_2 CEMS data.

Acid Rain Program Requirements for Units MB1, MB2, and MB3

In general, the permit misstates many of the Title IV Acid Deposition Control requirements. Specifically,

- The listed SO_2 requirements describe how to locate allowance allocations in the Code of Federal Regulations, but don't include any of the substantive requirements of Title IV, such as holding sufficient allowances to cover emissions, to monitor all emissions, and to obtain a Title IV permit [see paragraphs (c)(2) for Units MB1, MB2, and MB3 on pages 21, 26-27, and 30-31, respectively].

- The NO_x monitoring, recordkeeping, and reporting sections refer to the Part 76 requirements for obtaining an alternative NOx emission limitation rather than the standard, required monitoring, recordkeeping, and reporting requirements under Part 75 [see paragraphs (d)(1) for Units MB1, MB2, and MB3 on pages 22,27, and 31, respectively].

- The permit specifies that "In lieu of complying with the applicable emission limitation in Part 76, the units may average the NO_x emissions under an averaging plan approved under this section". In essence, this language could be interpreted to redefine the order in which EPA determines compliance with a NO_x averaging plan [individual units first and then the averaging plan if any individual unit exceeds their NO_x limit]. It is also unclear whether the condition even requires compliance with the averaging plan

- Unit MB3 does not receive its allowance allocation from 40 CFR Part 73, Table 1, as indicated [see paragraph (c)(2)(a), page 31]. Instead, Unit MB3 is a Phase II, Table 2 unit which elected to come into the acid rain program early under the substitution provisions. Its allowances are calculated using the special substitution equations in Part 73.

Because of these inconsistencies, we recommend that all existing acid rain related sections, both for SO_2 and NO_x, be removed from the proposed permit. It their place, we recommend that the permit simply reference the Thomas Hill Phase I [effective through December 31, 1999] and Phase II [effective from January 1, 2000 through December 31, 2004] permits as an attachment to the Title V permit. The Phase I and II permits, comprised of both the acid rain permit application and permitting agency approval, are fully self-enforcing and contain all applicable requirements. As an alternative, the department may elect to physically incorporate the full text of the Phase I and II approvals, along with the respective acid rain permit applications, into the Title V permit. If the department believes that further description of the acid rain program is necessary, such as how to identify the number of allowances assigned to each unit, it would be appropriate to include this information in the Statement of Basis.

Missing Applicable Requirements for Unit MB3

Subpart D NO_x

NSPS Subpart D applies to each fossil fuel fired steam generating unit, of more than 250 mmBtu/hr heat input rate, constructed after August 17, 1971. Thomas Hill Unit MB3 meets these applicability criteria. Further, 40 CFR §60.44(a)(3), establishes a 0.70 #/mmBtu NO_x emission rate for coal fired units. Along with the short-term 3-hour period defined for NO_x "excess emissions", found at 40 CFR §60.45(g)(3), this is a substantive, applicable requirement.

The proposed Title V permit does not list the NSPS Subpart D NO_x limitation as an applicable requirement. With no explanation in the Statement of Basis, we wonder whether this was an oversight or a deliberate omission. Because the short term NSPS NO_x limit is a substantially different standard than the annual NOx limitation under the Acid Rain Program, the department should take care to separate out and list each applicable requirement in the permit. Therefore, we recommend that the department revise the permit to include the applicable NSPS NO_x provisions. Further, we recommend the use of the NOx CEMS as the periodic monitoring method.

NSPS Subpart Y

NSPS Subpart Y, Standards of Performance for Coal Preparation Plants, applies to any of the following affected facilities, constructed after October 24, 1974, in coal preparation plants which process more than 200 tons per day: Thermal dryers, pneumatic coal-cleaning equipment (air tables), coal processing and conveying equipment (including breakers and crushers), coal storage systems, and coal transfer and loading systems. A *coal preparation plant* is "any facility (excluding underground mining operations) which prepares coal by one or more of the following processes: breaking, crushing, screening, wet or dry cleaning, and thermal drying. Except for thermal dryers, which are subject to both a particulate matter and opacity standard, all of the other equipment types described above are subject only to a 20% opacity standard.

Based on a review of the background materials for the standard, it is clear that it was meant to apply to coal-related equipment at boilers with processing capacities greater than 200 tons per day. We believe this standard applies to coal handling equipment for the NSPS Subpart affected Unit MB3, since MB3's capacity for coal is far in excess of 200 tons per day and the unit was constructed well after 1971. The standard may also apply to any modified or reconstructed coal handling equipment used to serve Units MB1 or MB2 or other coal burning devices. We recommend that MDNR review the likely applicability of this standard and notate any appropriate conditions in the permit, including periodic monitoring for opacity.

SO_2 SIP Requirements

The SO_2 SIP requirements, under 10 CSR 10-6.260, do not appear in the permit for Unit MB3. While it is clear that these rules apply, it is not clear if the department left them out of the permit because they deemed the NSPS Subpart D SO_2 requirements more stringent or just didn't consider the rule. In this case, we agree that the NSPS would be more stringent and could be used to verify compliance with the SIP. The SIP and NSPS standards have the same short-term 3-hour averaging period and the NSPS allows significantly lower SO2 emissions at 1.2 #SO_2/mmBtu versus the 8.0 #SO_2/mmBtu limitation in the SIP.

We recommend that the department provide an explanation in the Statement of Basis that it is streamlining the SO_2 SIP requirements for Unit MB3 by allowing the NSPS standards to take precedence. If the department elects otherwise, then the permit must include all applicable requirements, including the SO_2 SIP provisions.

Particulate Matter SIP Requirements

The omission of the SIP PM limits is nearly identical to the situation for SO_2 described above. The permit does not specify the applicable SIP PM requirements nor does it explain in the Statement of Basis why the standard was excluded. In this case, the NSPS and SIP PM standards are identical in terms of averaging time and numerical limit, so again we would allow the NSPS to take precedence. We recommend that the department clarify its intentions either by

explaining the omission of the PM rule from the permit, or by including it as an applicable requirement along with the appropriate periodic monitoring.

Other Applicable Requirements for Auxiliary Boilers AB3a and AB3b

Particulate SIP Requirements Missing

The proposed permit does not specify any applicable requirements for particulate matter, as required by 10 CSR 10-3.080. However, the units, each 155 mmBtu/hr, apparently were considered in setting the plantwide particulate limit of 0.18 #PM/mmBtu, as explained in the Statement of Basis. The permit must be revised to include a particulate matter limitation and appropriate periodic monitoring.

Since these units are limited, under the SO2 provisions, to fuel oil containing no more than 0.5% sulfur, by weight, we recommend that the department include a similar limitation in the particulate matter section. As described later in our comments, under the section labeled "**Periodic Monitoring for Particulate Matter for Auxiliary Boiler AB1**" in Attachment B, the monitoring requirements may be able to be substantially reduced if this type of sulfur-in-oil restriction is included.

Opacity Limitation

The permit indicates, on pages 37-39, that the auxiliary boilers were placed in service in 1981. For purposes of the SIP, these units should be considered "new" and therefore subject to a 20% opacity standard. The opacity limitations in Condition (10)(b)(1), though, establish a 40% requirement. The department should correct the permit accordingly.

Other Applicable Requirements for Coal Unloading, Coal Conveying, and Coal Crushing

The proposed permit seems to be missing the applicable requirements of *10 CSR 10-3.060, Restriction of Emission of Particulate Matter from Industrial Processes*. Based on a review of the standard, it appears that the rule creates no exemption for coal handling equipment and should therefore be listed as an applicable requirement. As a result, this equipment should either have a particulate mass rate or particulate concentration limitation as determined from the process weight table or appropriate equation. The Statement of Basis is also silent on why the standard may have been omitted. We recommend that the permit be revised to include the appropriate limitations and meaningful periodic monitoring.

Attachment B
Minor Permit Issues

Installation Description

In the Installation Description section, the permit lists the various major emission points at the Thomas Hill Energy Center. This information is very helpful. However, we recommend that the "ratings" for each boiler be stated in consistent units. Currently, the table shows a mix of megawatt and heat input ratings. Since most requirements at this facility rely on heat input for determining applicability, we recommend that all ratings be shown in terms of heat input.

Inclusion of Reference Method Results in the Permit

The permit lists the results of particulate matter performance tests previously conducted at the facility. While the public may find such information useful, it should not be memorialized in the permit along with other important applicable requirements. Instead, this background information would be appropriate for the Statement of Basis if the department thinks it is relevant to the permitting action.

Format of Opacity Monitoring Reports

Under the opacity recordkeeping requirements for Units MB1, MB2, and MB3, the permit generically requires the facility to keep an "opacity summary report", "excess opacity emission summary", "excess opacity emission summary list", and "opacity monitor downtime summary list". However, the permit doesn't define what data these records are to contain. Further, the permit requires AECI to report to the department, but doesn't specify the contents of the report. To remove any uncertainty, we recommend that the permit include an attachment showing an example of the desired report format for each of the categories listed above. The permit could include a copy of the standard form used by the state to summarize opacity information or a copy of the report format currently used by AECI to comply with its current COMS recordkeeping and reporting requirements under 10 CSR 10-3.080(D).

Because Unit MB3 is subject to NSPS Subpart D, it must report opacity data in the format outlined in 40 CFR Sections 60.45(g) and 60.7(c). Therefore, the permit should show this as the applicable reporting requirement, rather than the generic reports described above.

Lastly, the permit specifies that reports are due no later than 30 days after the "end of the reporting quarter". Historically, such reports have been due no later than 30 days after the "end of each calendar quarter". To avoid any confusion, it may be appropriate to either define a "reporting quarter" as a calendar quarter, or change the wording so that it is clear exactly when the reports are due.

Format of Subpart D SO_2 Monitoring Reports

Similar to the comments made for opacity reports, the SO_2 recordkeeping and reporting requirements for Unit MB3, found in Section 8)c) on page 30, are too vague. Unit MB3 must report its SO_2 data consistent with NSPS Subpart D, Section 60.45(g) and 40 CFR §60.7(c).

Fugitive Dust Rule No Longer State-Only

The permit indicates, on pages 14-15, that the "*Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin, 10 CSR 10-6.170*" is a state-only rule. However, this provision was recently adopted into the federally approved SIP, and should now be considered a federally enforceable requirement. The permit should be revised to remove the reference to state-only.

Reference to State Ambient SO_2 Rule

In a couple of places in the permit [see pages 20 and 25], the department notes that "the provisions of this paragraph are federally enforceable once 10 CSR 10-6.260 is incorporated into the federally-approved SIP as a final EPA action, at which time condition (4) will continue to remain a state-only requirement". This language is consistent with past recommendations made by Region 7. However, "*Restriction of Emission of Sulfur Compounds From Indirect Heating Sources, 10 CSR 10-6.260*" is now part of the federally approved SIP, except for 10 CSR 10-6.260(4) relating to compliance with the state's ambient standards. Therefore, the need to refer to this rules prospective adoption into the SIP is no longer necessary.

Since the permit will no longer contain the clarification noted above, it will be important to identify compliance with the state's ambient standards, found in 10 CSR 10-6.260(4), as a state-only requirement. Therefore, we recommend that permit be revised to clearly identify the requirements in paragraphs (c)(1)(a)(ii) for Units MB1 and MB2 as state-only, or otherwise identify 10 CSR 10-6.260(4) as state-only.

Periodic Monitoring for Particulate Matter for Auxiliary Boiler AB1

Auxiliary Boiler AB1 appears to be a small, oil-fired unit. Based on the calculated plant wide SIP particulate emission limitation, the unit is subject to a particulate limit of 0.18 #PM/mmBtu. The permit, in paragraph (9)(a)(c) on page 32, requires AECI to monitor the throughput of fuel oil used, apparently as a measure of unit compliance with the particulate standard. With this understanding, we are not sure how the fuel throughput is relevant where the standard is heat-input based. Of more relevance for monitoring would be the fuel characteristics; in particular the sulfur content and heating value. On the other hand, we agree that it is very unlikely that the unit will emit above the SIP PM threshold if limited to the use of "clean" fuel oil. In the case of distillate oil, AP-42 factor suggests that the unit would only emit at about 8% of the SIP standard. With a residual oil with a sulfur content greater than 1.0%, though, the unit would emit at 44% of the standard and with 3% sulfur oil the unit would exceed the SIP limit. Therefore, it appears that compliance with the standard is very much dependent on fuel quality. The SO_2 conditions for this unit limit sulfur content in the fuel to less than 0.5% weight percent.

A similar restriction in the particulate matter portion of the permit, along with a brief description in the Statement of Basis would correct this deficiency.

We recommend that the department include a description in the Statement of Basis explaining why detailed periodic monitoring is not necessary for this unit. We also recommend that Condition (9)(a) make clear that the unit is restricted only to lower sulfur fuel oil and other "cleaner" fuels. If the units' fuel capability is limited by its design, which is likely, then the explanation can be brief. In any case, the permit should guard against the use of unintended fuels which may put compliance with the particulate standard at jeopardy.

Opacity Requirements for Coal Unloading, Coal Conveying, Coal Crushing, and Fly Ash Loading

The permit, on pages 39-41, specifies opacity requirements for various pieces of coal handling equipment at the Thomas Hill plant. The section is very confusing and appears to have several "cut and paste" typographical errors. First, Condition 11 has two paragraph (a)'s. The first paragraph (a) notes that it only applies to emission points EP-08, EP-09, and EP-10 and excludes equipment dedicated to Unit MB3. Yet in this same paragraph, under (a)(1)(d), the reporting requirements introduce obligations for emission point EP-11; associated with Unit MB3. Further, it is unclear what the second paragraph (a) applies to. We guess, since it specifies the lower 20% opacity requirement, that this paragraph was meant for the newer Unit MB3. We recommend that the department review these two sections and sort out these inconsistencies.

The weekly observations of the coal handling equipment to evaluate visible emissions is acceptable. However, we recommend that the permit clearly require these observations to be made part of the records maintained at the plant site. Currently, it appears that no such documentation is required.

Lastly, it is unclear what purpose the recording of baghouse pressure drops will have unless accompanied by the underlying particulate matter reference method test data suitable to establish a connection between the two. If such records exist and can be used to establish a good compliance baseline, then we encourage their use. It probably makes more sense, though, to move the baghouse pressure drop requirements to the applicable requirements for process weight rate [see the section labeled "**Other Applicable Requirements for Coal Unloading, Coal Conveying, and Coal Crushing**" in Attachment A], since some type of control equipment parameter data will have to be collected for periodic monitoring purposes.

Attachment C
Summary of Periodic Monitoring Requirements

Consistent with EPA's "Periodic Monitoring Guidance for Title V Operating Permits Programs", dated September 15, 1998, we emphasize that a permit that does not contain adequate periodic monitoring does not meet the requirements of 40 C.F.R. Part 70. 10 CSR 10-6.065(6)(C)1.C.(I) states, in relevant part, that each Part 70 permit shall contain the following requirements with respect to monitoring:

> "Where the applicable requirement does not require periodic testing or instrumental or noninstrumental monitoring (which may consist of recordkeeping designed to serve as monitoring), then periodic monitoring sufficient to yield reliable data for the relevant time period that are representative of the installation's compliance with the permit. These monitoring requirements shall assure the use of terms, test methods, units, averaging periods, and other statistical conventions consistent with the applicable requirement."
>
> This language is nearly identical to that found in 40 C.F.R. § 70.6(a)(3)(i)(B).

In determining whether a permit application has appropriate periodic monitoring to assure compliance with all permit terms and conditions and all applicable requirements, a permitting authority must first determine whether an applicable requirement already requires periodic testing or instrumental or noninstrumental monitoring. See 40 C.F.R. § 70.6(a)(3)(i)(B); 10 CSR 10-6.065(6)(C)1.C.(I)(b). Whether an underlying applicable requirement contains periodic monitoring or testing must be judged according to the criteria defining and governing periodic monitoring: namely, whether it is sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit.

In order for each permit to include monitoring that is sufficient to assure compliance with all applicable requirements, an applicant or permitting authority may have to enhance or supplement monitoring or testing in an existing applicable requirement through periodic monitoring that yields reliable and representative compliance data. Alternatively, the underlying applicable requirement may already contain monitoring or testing sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit, in which case the periodic monitoring requirement is satisfied and no additional monitoring is necessary. An applicable requirement which contains any monitoring that recurs on some cyclical basis -- which presumably could be once every year, five years, ten years or more -- does not mean such monitoring is "periodic" for purposes of Title V and the Clean Air Act.

Where EPA determines that permits do not contain periodic monitoring that will assure compliance with a permit's terms and conditions, EPA may object to those proposed permits and require that any final issued permits be reopened to address any deficiencies.